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10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 Ralph Stovall,

14 Plaintiff,

15 v.

16 Trans Union LLC; Equifax Information
17 Services LLC; and American Honda
18 Finance Corporation,

19 Defendant.

Case No.: 2:22-cv-00079-GMN-BNW

**Stipulation to extend discovery
deadlines**

(Second request)

20 Ralph Stovall and American Honda Finance Corporation (“Honda” and
21 jointly as the “parties”), by and through their respective counsel, hereby stipulate to
22 modify the Court’s Discovery Plan and Scheduling Order as follows:

- 23 1. Expert disclosures: from Aug 23, 2022, to **Oct 22, 2022**;
- 24 2. Rebuttal disclosures: from Sep 22, 2022, to **Nov 21, 2022**;
- 25 3. Discovery cutoff date: from Oct 24, 2022, to **Dec 23, 2022**;
- 26 4. Dispositive motions: from Nov 23, 2022, to **Jan 22, 2023**;
- 27 5. Pretrial order from Dec 23, 2022, to **Feb 21, 2023**.

1 Pursuant to LR 26-4, good cause exists to amend the Scheduling Order. The
2 Parties have diligently pursued discovery. The Parties propounded written
3 discovery on each other and Plaintiff has noticed Defendant's Rule 30(b)(6)
4 deposition. Plaintiff intends to disclose an expert but needs additional time to
5 obtain written discovery responses and take Defendant's deposition before an
6 expert can be properly disclosed.

7 Honda is the only remaining active defendant in this case since all other
8 defendants have already settled or been dismissed. ECF Nos. 25, 31.

9 Plaintiff initially noticed Honda's deposition for June 15, 2022. The parties
10 still need additional time to take the depositions.

11 Further good cause exists to amend the Scheduling Order to provide
12 additional time to complete settlement discussions, which are actively ongoing.

13 Pursuant to LR 26-4(a), Plaintiff propounded and Honda responded to
14 written discovery requests. Plaintiff is working together with Honda to re-schedule
15 Honda's depositions.

16 Pursuant to LR 26-4(b), the parties request additional time to take
17 depositions and disclose experts.

18 Pursuant to LR 26-4(c), the reason the remaining discovery was not
19 complete within the time limits set by the discovery plan is because expert
20 discovery and the taking of depositions are a significant expense but settlement
21 discussions were ongoing and the parties hoped to resolve the case prior to
22 incurring these additional expenses.

23 Pursuant to LR 26-4(d), the parties' proposed discovery schedule is listed
24 above.
25
26
27

1 This is the parties' second request for an extension of these deadlines.

2
3 Dated: August 22, 2022.

4 **KIND LAW**

5
6 /s/ Michael Kind
7 Michael Kind, Esq.
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10 *Counsel for Plaintiff Ralph Stovall*

11 **WILSON ELSE MOSKOWITZ EDELMAN & DICKER LLP**

12 /s/ Chad Butterfield
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17 *Counsel for American Honda Finance Corporation*

18 **ORDER**

19 **IT IS SO ORDERED**

20 **DATED:** 4:47 pm, August 23, 2022

21 

22 **BRENDA WEKSLER**
23 **UNITED STATES MAGISTRATE JUDGE**